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Interim Co-Lead Counsel for Plaintiff Class

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

**IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO SEAL, PURSUANT TO
CIVIL LOCAL RULE 79-5(d),
PORTIONS OF PLAINTIFFS'
MOTION TO COMPEL GOOGLE
DOCUMENTS AND THE
DECLARATION OF DEAN M.
HARVEY IN SUPPORT THEREOF**

1 Pursuant to the Northern District of California Civil Local Rules 7-11 and 79-5(d),
2 Plaintiffs move to seal the following information:

3 (i) Portions of Plaintiffs' Motion to Compel Production of Google Documents,
4 specifically:
5 a. Page 2, line 1 through Page 2, line 20;
6 b. Page 2, footnote 1;
7 c. Page 4, line 23 through Page 3, line 24;
8 d. Page 4, line 26 through Page 3, line 28;
9 e. Page 5, line 2 through Page 6, line 5;
10 f. Page 6, portions of footnote 5.
11 (ii) The following exhibits from the Declaration of Dean M. Harvey in Support
12 of Plaintiffs' Motion to Compel Production of Google Documents: A-H,
13 and J-M.

14 None of the information at issue was designated confidential by Plaintiffs. Instead,
15 Defendants designated the above noted information as Confidential or Attorneys-Eyes Only under
16 the Stipulated Protective Order (Modified by the Court), Dkt. No. 107. Therefore, the
17 requirements under Local Rule 79-5(d) apply.

18 Pursuant to Local Rule 79-5(c), the proposed redacted versions of Plaintiffs' Motion to
19 Compel Google Documents, and the Declaration of Dean M. Harvey in support thereof, have
20 been attached as Exhibits A and B, respectively. Pursuant to this Court's January 11, 2013 Order
21 (Dkt. 269), attached hereto as Exhibits C and D, lodged with the Court, are Plaintiffs' Motion to
22 Compel Google Documents with the proposed redactions highlighted in yellow, and Declaration
23 of Dean M. Harvey in support thereof, unredacted. Pursuant to Local Rule 79-5(c)(3) and (4), the
24 present motion and all exhibits are being served and lodged with the Clerk in paper form.

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1 Respectfully submitted,

2 Dated: January 16, 2013 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

3 By: /s/ Dean M. Harvey
4 Dean M. Harvey

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